

Message

From: Sanchez, Yolanda [Sanchez.Yolanda@epa.gov]
Sent: 8/18/2020 1:07:20 AM
To: Chesnutt, John [Chesnutt.John@epa.gov]
CC: Praskins, Wayne [Praskins.Wayne@epa.gov]; Yogi, David [Yogi.David@epa.gov]; Gill, Sonam [Gill.Sonam@epa.gov]
Subject: RE: Please review draft email to congressionals re: Parcel G Approval Letter
Attachments: CongressEmailCover_SoilApprovalah.docx_v5.docx

John,
Attached is an updated email to congressional offices. In addition to adding information of the RESRAD consultation, Angeles also requested information on the memo-to-file. Therefore, I needed to cut some language throughout because it is getting really, really long.

I'll send my complete comments on the actual RESRAD letter tomorrow morning before 10 am... This has been a lot of work to turnaround in a short time.

Wayne,
For the cover email, I further streamlined the conclusion sentence in your letter to be:

At this time, we cannot concur with the Navy's conclusion that the radiological building remediation goals remain protective of human health in the long-term due to our unclarity on some of the mechanics of RESRAD BUILD.

Please let me know if you have concerns with this sentence! I'm sure John will want to put this in front of Angeles/Enrique tomorrow.

Yolanda Sanchez
U.S. EPA || Community Involvement for Superfund
Desk: 415-972-3880

From: Herrera, Angeles <Herrera.Angeles@epa.gov>
Sent: Monday, August 17, 2020 9:47 AM
To: Chesnutt, John <Chesnutt.John@epa.gov>
Cc: Sanchez, Yolanda <Sanchez.Yolanda@epa.gov>; Manzanilla, Enrique <Manzanilla.Enrique@epa.gov>
Subject: RE: Please review draft email to congressionals re: Parcel G Approval Letter

Thanks John. I reviewed both documents. I am ok with the approval letter. Attached are a few comments on the congressional email. In addition, we will need to add a paragraph and attach our letter of the evaluation of the RESRAD consultation. Thanks. AH

From: Chesnutt, John <Chesnutt.John@epa.gov>
Sent: Thursday, August 13, 2020 1:50 PM
To: Herrera, Angeles <Herrera.Angeles@epa.gov>; Manzanilla, Enrique <Manzanilla.Enrique@epa.gov>
Cc: Sanchez, Yolanda <Sanchez.Yolanda@epa.gov>
Subject: Please review draft email to congressionals re: Parcel G Approval Letter

Angeles and Enrique,

Please review the below (also attached) draft email that we would send to congressionals along with our Approval Letter. As soon as you OK this email, we will send the letter to the Navy, post the letter on our

website, and then send this email. The near final Approval Letter is also attached for your information and review if interested.

We are preparing a separate congressional email to transmit our CI/RAB letter when it follows this letter.

Thanks, John

DRAFT EMAIL TO CONGRESSIONALS RE: PARCEL G WORKPLAN APPROVAL

We have committed to keep you updated on EPA's oversight of the Navy's radiological retesting at the Hunters Point Naval Shipyard site.

On DATE, EPA sent the Navy a letter (attached) to provide EPA approval of Navy plans to proceed with the soil radiological retesting at Parcel G. This retesting is part of the Navy's Parcel G work plan where the Navy will evaluate soils previously tested by Tetra Tech EC Inc., (TTEC). The Navy will begin this retesting at Parcel G, then complete work plans to perform radiological rework on other parcels.

The Parcel G work plan outlines how the Navy will analyze more than 7,000 soil samples to evaluate whether any site-related contamination remains on the shipyard. The Navy will determine if additional cleanup is needed, working with EPA and the state, as appropriate. This decision will be based on the established remediation goals (cleanup levels) for each radionuclide, as well as background. "Background" refers to levels of chemicals or radionuclides that exist in the environment in absence of Superfund site contamination. These values are important, because Superfund site cleanups generally do not clean up below background levels.

In June 2020, the Navy finalized its report presenting the soil reference background study with input from the regulatory agencies. In the background study report, the Navy established a "background threshold value" for Cesium-137 that is slightly higher than the remediation goal (cleanup level) for the site. Consistent with EPA guidance, this Cesium-137 value may be used as a new cleanup target, effectively applied as a new remediation goal. Additionally, the Navy found a relatively large range of background radionuclide concentrations in onsite soils. This is in part due to the complex land fill history of the site. (Most of the surface soils consist of rock and soil cut from nearby hills, sediments dredged from the San Francisco Bay, and other offsite sources of fill material.) During the radiological retesting, the Navy will focus on addressing site-related radionuclides in soil.

At its July 23, 2020, virtual community meeting, the Navy announced it had authorized its contractors to prepare for the fieldwork. We understand that the Navy and its contractor have implemented a number of measures to protect their employees and control the spread of COVID-19. Throughout the fieldwork, we expect the Navy will periodically report on its efforts to control dust and monitor air quality to EPA, the State, and the community. In addition, EPA and the state expect to be onsite to monitor Navy compliance with its Parcel G work plan and to independently analyze select soil samples.

At the conclusion of the soil radiological retesting fieldwork, the Navy will produce a completion report. In addition to summarizing the results of the fieldwork, we expect the Navy's completion report will evaluate additive cancer risk from multiple radiological and chemical contaminants, if present. This information will better inform the public, EPA, and Navy risk managers about the protectiveness of the cleanup.